



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

January 26, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Nickell Moulding Company, Inc. / SSM 039-18161-00174

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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January 26, 2004

Mr. George Nickell
Nickell Moulding Company, Inc.
P.O Box 1502
Elkhart, IN 46515

Re: **039-18161**

Significant Source Modification to:

Part 70 Operating Permit No.: **T 039-12118-00174**

Dear Mr. Nickell:

Nickell Moulding Company, Inc. was issued Part 70 Operating Permit **T 039-12118-00174** on November 13, 2000 for a wood moulding manufacturing source. An application to modify the source was received on September 22, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Benchmark Side

- (d) Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.

Nickell Side

- (i) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, capacity: 29.7 tons of wood panels per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this

approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Craig J. Friederich c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

CJF/MES

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Nickell Moulding Company, Inc.
3015 Mobile Drive, Elkhart, IN 46514
And
Benchmark
3026 Winding Waters Lane, Elkhart, IN 46514

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Significant Source Modification No.: 039-18161-00174	Conditions Affected: A.2, D.1.3, D.2.4, D.3.1-D.3.7 Sections Affected: D.1, D.2, D.3
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 26, 2004

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D.3 FACILITY OPERATION CONDITIONS

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- D.3.4 Visible Emissions Notations
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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary wood moulding manufacturing source. This source consists of the Benchmark and Nickell sides.

Responsible Official:	George Nickell
Source Address:	Nickell Moulding ,3015 Mobile Drive, Elkhart, Indiana 46514 Benchmark, 3026 Winding Waters Lane, Elkhart, IN 46514
Mailing Address:	P.O. Box 1502, Elkhart, Indiana 46515-1502
SIC Code:	2431
County Location:	Elkhart
County Status:	Maintenance for ozone, attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program, Minor Source under PSD; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Benchmark Side

- (a) Three (3) surface coating machines (two spray machines, #1 and #2, and one (1) striper machine), equipped with airless spray applicators, capacity: 7,500 board feet of wood per hour, each, with dry filters as control.
- (b) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D1.
- (c) Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.
- (d) Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.

Nickell Side

- (a) Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each, with dry filters as control.
- (b) One (1) Stainer machine, 7500 board feet of wood per hour.
- (c) One (1) spray-type Vacuum Coater machines, 7500 board feet of wood per hour, each.

Nickell Moulding Company
Elkhart, Indiana
Permit Reviewer: SLM/Iryn Calilung

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- (d) One (1) high-volume low-pressure spray repair booth, capacity, 7,500 board feet of wood per hour, with dry filters as control.
- (e) One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.
- (f) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D2.
- (g) One (1) portable striping machine, capacity: 7,500 board feet of wood per hour
- (h) One (1) Patina Spray Machine, 7500 board feet of wood per hour.
- (i) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, capacity: 29.7 tons of wood panels per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Benchmark Side

- (a) Three (3) surface coating machines (two spray machines, #1 and #2, and one (1) striper machine), equipped with airless spray applicators, capacity: 7,500 board feet of wood per hour, each, with dry filters.
- (b) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D1.
- (c) Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.
- (d) Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood moldings shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compounds (VOC's)

- (a) Any change or modification that will cause potential emissions of VOC from the entire source to 250 tons or more must have prior approval from the Office of Air Management.
- (b) The total source potential to emit is less than 250 tons per year.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2, the PM from the three (3) surface coating machines (two spray

machines, #1 and #2, and one (1) striper machine), shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities and two (2) Moulding Compo Machines shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Particulate Matter

Pursuant to CP-039-2889, issued February, 1995, and CP-039-4798 issued December 21, 1995, the baghouse D-1 for PM control shall be in operation at all times when the woodworking operation is in operation, to comply with 326 IAC 6-3-2 and to make 326 IAC 2-2 not applicable.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter

Pursuant to CP-039-2889, issued on February, 1995 and CP-039-4798 issued on December 21, 1995, the dry filters for PM control shall be in operation at all times when the surface coating operations are in operation, to comply with 326 IAC 6-3-2 and to make 326 IAC 2-2 not applicable.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Nickell Side

- (a) Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each, with dry filters.
- (b) One (1) spray-type Vacuum Coater machine, 7500 board feet of wood per hour.
- (c) One (1) Stainer Machine, 7500 board feet of wood per hour.
- (d) One (1) high-volume low-pressure spray repair booth, capacity: 7,500 board feet of wood per hour, with dry filters.
- (e) One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.
- (f) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D2.
- (g) One (1) portable striping machine, capacity 7500 board feet of wood per hour.
- (h) One (1) Patina Spray machine, 7500 board feet of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood moldings shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 Volatile Organic Compounds (VOC's)

- (a) Any change or modification that will cause potential emissions of VOC from the entire source

to 250 tons or more must have prior approval from the Office of Air Quality.

- (b) The total source potential to emit is less than 250 tons per year.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the five (5) high-volume low-pressure spraying machines, one (1) spray-type Vacuum Coater machine, one (1) Stainer Machine, one (1) high-volume low-pressure spray repair booth, one (1) portable striping machine, and one (1) Patina Spray machine shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the wood-working operation shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.667} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.6 Particulate Matter (PM)

The baghouse D2, for PM control shall be in operation and control emissions from the woodworking at all times that the facility is in operation, to comply with 326 IAC 6-3-2 and to make 326 IAC 2-2 not applicable.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Particulate Matter

Pursuant to CP-039-2889, issued on February, 1995 and CP-039-4798 issued on December 21, 1995, the dry filters for PM control shall be in operation at all times when the surface coating operations, are in operation.

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle Loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be

considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (j) **One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, capacity: 29.7 tons of wood panels per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking operation shall not exceed 39.8 pounds per hour when operating at a process weight rate of 59,429 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Particulate Control

In order to comply with Condition D.3.1, the cyclone/baghouse for particulate control shall be in operation and control emissions from the one (1) woodworking operation at all times that the one (1) woodworking operation is in operation.

D.3.4 Visible Emissions Notations

- (a) Daily visible emission notations of the one (1) woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the one (1) woodworking operation stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Significant Source and Significant Permit Modifications

Source Background and Description

Source Name:	Nickell Moulding Company, Inc.
Source Location:	3015 Mobile Drive, Elkhart, IN 46514 and Benchmark, 3026 Winding Waters Lane, Elkhart, IN 46514
County:	Elkhart
SIC Code:	2431
Operation Permit No.:	T 039-12118-00174
Operation Permit Issuance Date:	November 13, 2000
Significant Source Modification No.:	039-18161-00174
Significant Permit Modification No.:	039-18269-00174
Permit Reviewer:	Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a modification application from Nickell Moulding Company, Inc. relating to the construction and operation of the following emission units and pollution control devices, as well as the relocation of the two (2) Compo Moulding Machines from the Nickell side to the Benchmark side:

Benchmark Side

- (a) Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.
- (b) Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.

Nickell Side

- (c) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, capacity: 29.7 tons of wood panels per hour.

History

On September 22, 2003, Nickell Moulding Company, Inc. submitted an application to the OAQ requesting to add an additional woodworking operation and three (3) foil laminating wrappers to their existing plant. Nickell Moulding is also requesting to relocate their two (2) Moulding Compo Machines, known as COMP01, and COMP02, from the Nickell Side to the Benchmark Side. Nickell Moulding Company, Inc. was issued a Part 70 permit on November 13, 2000.

Source Definition

- (a) Benchmark is located at 3026 Winding Waters Lane, Elkhart, IN 46514; and

(b) Nickell is located at 3015 Mobile Drive, P.O. Box 1502, Elkhart, IN 46515.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no stacks associated with the facilities being constructed.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 22, 2003. Additional information was received on October 27, 2003.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations for the woodworking operations.

The potential to emit MDI, a VOC, from the three (3) foil laminating wrappers has been estimated by the source to be a total of 0.06 tons per year. This calculation was based on the equation provided by the Society of the Plastic's Industry's Polyurethane Division under the provisions of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	410
PM ₁₀	410

Pollutant	Potential To Emit (tons/year)
SO ₂	--
VOC	0.06
CO	--
NO _x	--

HAPs	Potential To Emit (tons/year)
MDI	0.06
TOTAL	0.06

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4), because the potential to emit PM and PM₁₀ is greater than one-hundred (100) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-18269-00174) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed emission units.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

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Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	180
PM ₁₀	140
SO ₂	--
VOC	227
CO	--
NO _x	--

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon Technical Support Document for T 039-12118-00174.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	4.10	4.10	--	--	--	--	0.06
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 with the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential to emit PM and PM₁₀ from this modification is less than two-hundred fifty (250) tons per year, after controls. Therefore, this is a minor modification to an existing minor source.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate from the one (1) woodworking operation equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, shall not exceed 39.8 pounds per hour when operating at a process weight rate of 29.7 tons per hour. This limitation is based upon the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone/baghouse shall be in operation at all times the one (1) woodworking operation is in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike

Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The one (1) woodworking operation has applicable compliance monitoring conditions as specified below:
 - (1) Daily visible emissions notations of the one (1) woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) An inspection shall be performed each calendar quarter of all bags controlling the one (1) woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (3) In the event that bag failure has been observed:
 - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the

failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cyclone/baghouse for the one (1) woodworking operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Benchmark Side

- (c) **Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.**
- (d) **Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.**

Nickell Side

- ~~(j) Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.~~
- (i) **One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3, capacity: 29.7 tons of wood panels per hour.**

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Benchmark Side

- (c) **Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through Stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood moulding per minute each.**
- (d) **Three (3) foil laminating wrappers, identified as L1 through L3, capacity: 75.0 pounds of polyurethane adhesive per hour, total.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities **and two (2) Moulding Compo Machines** shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Nickell Side

- (a) Five (5) high-volume low-pressure spraying machines, capacity: 7,500 board feet of wood per hour, each, with dry filters.
- (b) One (1) spray-type Vacuum Coater machine, 7500 board feet of wood per hour.
- (c) One (1) Stainer Machine, 7500 board feet of wood per hour.
- (d) One (1) high-volume low-pressure spray repair booth, capacity: 7,500 board feet of wood per hour, with dry filters.
- (e) One (1) stain wiping area, capacity: 7,500 board feet of wood per hour.
- (f) One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, known as D2.
- (g) One (1) portable striping machine, capacity 7500 board feet of wood per hour.
- (h) One (1) Patina Spray machine, 7500 board feet of wood per hour.
- (i) ~~Two (2) Moulding Compo Machines, known as COMP01, and COMP02, each exhausting through stack E16, capacity 55.25 pounds of synthetic wood paste, known as Compo, per hour each and 55 feet of wood mouldings per minute each.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the wood-working operation ~~and two (2) Moulding Compo Machines~~ shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.667} \quad \text{where} \quad E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (j) **One (1) woodworking operation, equipped with a cyclone/baghouse dust collector, venting inside the building, known as D3.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) woodworking operation shall not exceed 39.8 pounds per hour when operating at a process weight rate of 59,429 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.3 Particulate Control

In order to comply with Condition D.3.1, the cyclone/baghouse for particulate control shall be in operation and control emissions from the one (1) woodworking operation at all times that the one (1) woodworking operation is in operation.

D.3.4 Visible Emissions Notations

- (a) Daily visible emission notations of the one (1) woodworking operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1)

month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the one (1) woodworking operation stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records

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of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.

- (c) To document compliance with Condition D.3.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-18161-00174 and Significant Permit Modification No. 039-18269-00174.

Appendix A: Emission Calculations
Baghouse/Cyclone

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Company Name: Nickell Moulding Company, Inc.
Address City IN Zip: 3015 Mobile Drive, Elkhart, IN 46514
SSM: 039-18161
Plt ID: 039-00174
Reviewer: Craig J. Friederich
Date: September 22, 2003

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
D3	99.0%	0.0044	25000	93.64	410.2	0.9364	4.102

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)